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January 3, 2024

**VIA ECF**

Hon. Miroslav Lovric  
U.S. Magistrate Judge  
U.S. District Court  
Northern District of New York  
Binghamton U.S. Courthouse  
15 Henry St.  
Binghamton, NY 13901

**Re: *Honeywell Int'l Inc. v. Buckeye Partners, L.P. et al.*, No. 5:18-cv-00646-FJS-ML; *Honeywell Int'l Inc. v. Energy Transfer (R&M), LLC et al.*, No. 5:18-cv-01176-FJS-ML; *Honeywell Int'l Inc. v. CITGO Petroleum Corp.*, No. 5:19-cv-01219-FJS-ML (consolidated)**

Dear Judge Lovric,

Pursuant to the Court's November 1, 2023 Text Order, ECF No. 360, all parties to the above-referenced matters conferred and provide the Court with the following status report:

As the parties' explained in their last joint status report filed on October 31, 2023, ECF No. 359, the parties conducted a three-day mediation in Boston with mediator Michael Last. The parties have not yet settled any of the above-captioned cases; however, Honeywell has reached an agreement in principle with the Buckeye defendants and Honeywell and Buckeye are in the process of preparing written agreements to memorialize that settlement. We anticipate that the settlement will also resolve a large portion of the third-party claims. Honeywell remains open to continuing settlement discussions with the non-settling parties.

With respect to the ongoing discovery efforts, since our last report the parties have exchanged additional discovery requests, met and conferred on discovery issues, and exchanged deficiency letters regarding productions. The parties will continue producing documents and completing their responses to the outstanding discovery requests. In addition, Honeywell produced over 3,500 documents comprising nearly 200,000 pages and



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CITGO produced 181 documents comprising 8,344 pages. The parties continue to work diligently and cooperatively to respond to open discovery items and to review the large volumes of documents that have been produced. While the parties are working in good faith to resolve open issues, there is some possibility that one or more of the parties may seek leave to file a motion to compel in the future.

All parties consented to my filing this joint status report on their behalf.

Sincerely,

/s/ Tyler L. Burgess

Tyler L. Burgess

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